

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

2009 JUL 15 PM 1:04

STATE OF TENNESSEE, *et al.*)
ROBERT E. COOPER, JR., ATTORNEY)
GENERAL and REPORTER,)
D.C.)

Plaintiff,)

v.)

Case No. 09C2025

MICHAEL H. SNEED,)

Defendant.)

STATE'S REPLY TO DEFENDANT'S RESPONSE TO MOTION FOR INJUNCTION

The State respectfully replies to the Defendant's Response to the State's Motion for Statutory Temporary Injunction.

Claiming this Court does not have jurisdiction, the Defendant argues that the Motion should be denied because he has sued Justice Cornelia Clark of the Supreme Court for the State of Tennessee, Michael Catalano, Clerk for the Tennessee State Supreme Court and Nancy Jones, Director of the Tennessee Board of Professional Responsibility alleging the order of enforcement which suspends Defendant's Tennessee law license ("Order") was procured in fraud. Defendant has produced no evidence that the Supreme Court's Order has been stayed or is otherwise anything other than final and his claims in any other lawsuits are, at this point, nothing more than mere allegations. However, Defendant's arguments are misplaced because the State is not attempting to enforce the Supreme Court's Order. Defendant's suspension under the Order is a fact the State alleges in its Complaint against the Defendant for violations of the Tennessee Consumer Protection Act and the Unauthorized Practice and Improper Conduct statutes and the

State has provided proof of the terms of the Order. The mere filing of a separate lawsuit by the Defendant does not affect the jurisdiction of this Court in an action brought by the State to enforce its laws. Therefore, the Defendant having provided no facts or legal theory contradicting the proof offered by the State, the State's Motion for Statutory Temporary Injunction should be granted.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent via facsimile and via U.S Mail on this the 15 day of July 2009 to:

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